

CONFIDENTIAL TREATMENT REQUESTED UNDER 14 C.F.R. § 302.12

Application of:)
)
Mountain Air Cargo, Inc.)
)
for issuance of a Certificate of)
Public necessity and Convenience)
In accordance with 49 U.S.C. 41102)
_____)

DOCKET Nos .DOT-OST-2021-0121 and 0122

**AMENDED MOTION OF MOUNTAIN AIR, INC. TO WITHHOLD
INFORMATION FROM PUBLIC DISCLOSURE**

Communications with respect to this document should be sent to:

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June 22, 2022

TRANSMITTED BY ELECTRONIC MAIL

CONFIDENTIAL TREATMENT REQUESTED UNDER 14 C.F.R. § 302.12

Application of:)
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Mountain Air, Inc.) **DOCKET Nos . DOT-OST-2021-0121 and 0122**
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Public Convenience and Necessity)
In accordance with 49 U.S.C. § 41102))
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**AMENDED MOTION OF MOUNTAIN AIR CARGO, INC. TO WITHHOLD
INFORMATION FROM PUBLIC DISCLOSURE**

Mountain Air Cargo, Inc. (hereafter “MAC”) hereby moves to amend its June 6, 2022 motion to withhold from public disclosure certain privileged or confidential commercial or financial information that the Department of Transportation (hereafter “DOT”) requested from MAC in its letter dated May 11, 2022. The amended motion incorporates by reference all the information and exhibits contained in the June 6, 2022 motion, except Exhibit 1, which has been replaced by an amended exhibit that shows that AO Partners I, L.P. is comprised of only United States Citizens.¹ The affidavit of Mark Jundt, Air T, Inc.’s General Counsel, which is attached as an exhibit, also evidences that AO Partners I, L.P. is comprised only of United States

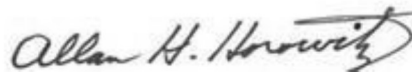
¹ The amended exhibit is a chart entitled “AO Partners I, L.P. (Delaware Limited Partnership) Ownership.” The amended exhibit is identified as Exhibit 2 in MAC’s Amended Response to the Issues Raised by the Department of Transportation in its May 11, 2022 letter. A copy of Exhibit 2 is attached.

citizens.² The amended motion is filed pursuant to section 302.12 of the Department of Transportation's Rules of Practice. In accordance with Rule 12, the information at issue is being submitted herewith in a sealed envelope marked "Confidential Treatment Requested Under Section 302.12" and is being filed under seal.

WHEREFORE, for the foregoing reasons, the Department should grant Mountain Air Cargo, Inc.'s Amended Motion for Confidential Treatment under section 302.12 and withhold the commercially sensitive information that is the subject of this motion from public disclosure, as requested herein.

Dated: June 22, 2022

Respectfully submitted,

A handwritten signature in dark ink, reading "Allan H. Horowitz", with a long horizontal line extending to the right.

Allan H. Horowitz
Fox Rothschild LLP
Counsel for Mountain Air Cargo, Inc.

² Mr. Jundt's Declaration dated June 17, 2022 is identified as Exhibit 1 in MAC's Amended Response to the Issues Raised by the Department of Transportation in its May 11, 2022 letter. A copy of Exhibit 1 is attached.

CERTIFICATE OF SERVICE

I certify that on June 22, 2022, in accordance with the requirements set forth in 14 C.F.R. § 302.3(a)(1), I served Mountain Air Cargo, Inc.'s Amended Motion for Confidential Treatment of Exhibits 1 and 2 of Mountain Air Cargo, Inc.'s Amended Response to the Issues raised in the Department of Transportation's May 11, 2022 letter with the Exhibits 1 and 2 redacted, on the Office of Dockets, U.S. Department of Transportation, by electronic means using the process set at <http://www.regulations.gov>

I also certify that on June 22, 2022, I served an executed original and three true copies of Mountain Air Cargo, Inc.'s Amended Motion for Confidential Treatment of Exhibits 1 and 2 of Mountain Air Cargo, Inc.'s Amended Response to the Issues raised in the Department of Transportation's May 11, 2022 letter, with Exhibits 1 and 2 unredacted, on the Office of Dockets, U.S. Department of Transportation, by Federal Express Overnight Delivery, at Docket Management Facility, U.S. Department of Transportation, 1200 New Jersey Avenue SE, West Building Ground Floor, Room W12-140, Washington, DC 20590-0001.

I also certify that on June 22, 2022, I served, by electronic mail, Lauralyn Remo, Chief, Department of Transportation Air Carrier Fitness Division, at laura.remo@dot.gov, and Catherine O'Toole, Analyst, Department of Transportation Air Carrier Fitness Division, at Catherine.O'toole@dot.gov a copy of Mountain Air Cargo, Inc.'s Motion for Confidential Treatment of Exhibits 1 and 2 of Mountain Air Cargo, Inc.'s Amended Response to the Issues raised in the Department of Transportation's May 11, 2022 letter, with Exhibits 1 and 2 redacted, and with Exhibits 1 and 2 unredacted.

/s/ Martha W. Johns
Martha W. Johns
Paralegal – Fox Rothschild LLP

TABLE OF EXHIBITS

<u>Exhibit</u>	<u>Page</u>	<u>Description</u>
1	5	Declaration of Mark Jundt
2	7	Chart entitled Chart entitled “ AO PARTNERS I, L.P. (Delaware Limited Partnership) OWNERSHIP ”

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DECLARATION OF MARK JUNDT

COMES NOW, Mark Jundt, and states as follows:

1. The undersigned officer (hereafter the “Declarant”) is the General Counsel of Air T, Inc., and he is duly authorized to and does make this Declaration for Air T, Inc. (hereafter “Air T”).

2. Air T is a corporation organized under the laws of the State of Delaware and is a citizen of the United States within the meaning of 49 U.S.C. § 40102(a)(15).

3. Mountain Air Cargo, Inc. (hereafter “MAC”) is a wholly owned subsidiary of Air T, which was established in 1980. Air T is publicly traded on the NASDAQ stock exchange and is a decentralized holding company.

4. AO Partners I, L.P. and AO Partners, LLC collectively own approximately 45.96% of Air T’s common shares of stock.

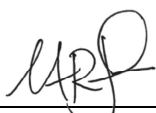
5. On June 17, 2022, AO Partners I, L.P. redeemed all of the L.P. interest of [REDACTED] [REDACTED] citizen. [REDACTED] no longer has any interest in AO Partners I, L.P.

6. As a result of the redemption of [REDACTED]’ L.P. interest, AO Partners I, L.P. is comprised of only U.S. Citizens.

7. That pursuant to 18 U.S.C. § 1001, I, Mark Jundt, in my individual capacity and as the General Counsel of Air T, Inc., declare that all statements made herein of my own knowledge are true, and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that any false, fictitious, or fraudulent statements made knowingly or willfully are punishable, 18 U.S.C. § 1001, by a fine of not more than \$10,000 or imprisonment of not more than five years, or both.

The Declarant states nothing further.

Dated: June 17, 2022



Mark Jundt
General Counsel
Air T, Inc.

AO PARTNERS I, L.P. (Delaware Limited Partnership) OWNERSHIP

	Ownership Percentage	Individual Citizenship	Jurisdiction of Formation	For Trusts Only	
				Name and Citizenship of Trust Grantor	Name and Citizenship of Trustee
General Partner		N/A		N/A	N/A
		N/A		N/A	N/A
		N/A			
Limited Partners			N/A	N/A	N/A
			N/A	N/A	N/A
			N/A	N/A	N/A
		N/A			
		N/A			
		N/A			
			N/A	N/A	N/A